

1. A Settlement Agreement (“Agreement”) is in the process of being finalized amongst the parties. Once the Agreement is fully executed, and Plaintiff has received the consideration required pursuant to the Agreement, the parties will submit a Stipulation of Dismissal with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and will therein request that the case be dismissed and closed.
2. The parties respectfully request that the Court stays this case and adjourns all deadlines and conferences.
3. We respectfully request the Court provide that the parties may seek to reopen the matter for forty-five (45) days to assure that the parties have complied with their obligations under the Agreement.

Dated: October 29, 2020

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